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Attorneys for Defendant
KEITH MACHINERY CORP.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

X
RAMON REYES,

Plaintiff,

**Civil Action No. 2:09-CV-05309
(DRD/MAS)**

-against-

KEITH MACHINERY CORP., LITTLEFORD
BROTHERS, INC., LITTLEFORD DAY, INC., LFB
INC., MAKINO INC., AND JOHN DOE 1-100 (a
fictitious name) individually and/or t/a XYZ Co., 1-
100 (a fictitious name); and ABC Corporation; 1-100
(a fictitious name); JANE DOE 1-100 (a fictitious
name),

Defendants.

X

Scott Haworth, under penalty of perjury, affirms as follows:

1. I am an attorney at law, duly licensed to practice in the State of New Jersey, and a

Member of Haworth Coleman & Gerstman, LLC, attorneys for defendant Keith Machinery Corp.
("KMC"). I am fully familiar with all matters set forth herein.

2. This Certification and accompanying Memorandum of Law are submitted in
support of KMC and Makino, Inc., Littleford Brothers, Inc., Littleford Day, Inc. and LFB, Inc.'s
(collectively "Littleford") joint motion *in limine* seeking preclusion of all evidence of any
version of ANSI B177.1 after 1997 and any post-accident modifications to the subject mill at
trial pursuant to Fed. R. Evid. 402, 403, and 407.

3. In support of their motion, KMC and Littleford rely on the following exhibits:

Exhibit A: ANSI B177.1 (1979, 1997 and 2007 versions); and

Exhibit B: Deposition of Thomas J. Cocchiola, P.E, dated July 18, 2011

4. For the reasons set forth in the accompanying Memorandum of Law, KMC and Littleford's motion should be granted in its entirety.

Dated: March 5, 2012

Respectfully Submitted,



Scott Haworth (SH 5890)
Abigail Bowen (AB 1046)
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